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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No.:
	)	2:16-cr-00006-JCM-PAL-1
Plaintiff,	)	
	)	<b>DEFENDANT'S UNOPPOSED</b>
vs.	)	<b>MOTION FOR ENLARGEMENT</b>
	)	<b>OF TIME TO FILE REPLY TO</b>
GUSTAVO VILLA GARCIA	)	<b>GOVERNMENT'S RESPONSE TO</b>
	)	<b>DEFENDANT'S MOTION FOR</b>
Defendants,	)	<b>ORDER OF DISMISSAL</b>
	)	<b>FRCP 6(b)(1)(A)</b>

Comes now, RICARDO BRAVO-BRAVO, by and through his Attorney, XAVIER GONZALES, ESQ. hereby files a MOTION FOR ENLARGEMENT OF TIME to file it's Reply to the Government's Response to Defendant's Motion For Order Of Dismissal, filed with the Court on August 8<sup>th</sup> 2016. Defendant's response to the Government's filing is due one or before August 14<sup>th</sup> 2016.

This motion is made and based upon Federal Rule of Civil Procedure FRCP 6, no previous request for an extension has been requested.

Respectfully submitted this 13<sup>th</sup> of Augsut, 2016.

By: /s/ Xavier Gonzales, Esq.  
XAVIER GONZALES, ESQ.  
*Attorney for Defendant*

1 In support of the instant Motion, the Plaintiff submits the following:

- 2 1. The Government's Response to Defendant's Motion For Order of Dismissal was
- 3 filed with the Court on August 8<sup>th</sup> 2016.
- 4 2. On August 8<sup>th</sup> 2016, the legal staff for undersigned Counsel contacted Kathryn
- 5 Newman, Counsel for the Government, advising her that we had received their
- 6 response to the Motion For Order of Dismissal, and further notified that
- 7 undersigned Counsel was out of the jurisdiction. Since the issues in the matter
- 8 are significantly complex and require a thorough review of the facts and law, that
- 9 additional time is being requested for thorough review upon undersigned
- 10 Counsels return.
- 11 3. I advised of the need for one (1) additional week to respond to the Government's
- 12 Response to Defendant's Motion For Order of Dismissal. Defendant's response
- 13 is currently due on or before August 14<sup>th</sup> 2016.
- 14 4. Kathryn Newman, Assistant United States Attorney, stated on August 8<sup>th</sup> 2016
- 15 that she had not objection to Plaintiff's Motion for an Enlargement of Time of one
- 16 week.
- 17
- 18

19 Therefore, it is hereby requested an additional week from today's date, preferably on

20 or before August 22<sup>nd</sup> 2016, to file a reply. This Motion is made in good faith and not for the

21 purposes of delay, and it is believed neither party is prejudiced by the instant request for

22 enlargement of time.

23

24 Respectfully submitted this 13<sup>th</sup> day of August, 2016.

25 IT IS SO ORDERED this 19<sup>th</sup>

26 day of August, 2016.

By: /s/ Xavier Gonzales, Esq.  
 XAVIER GONZALES, ESQ.  
 Attorney for Defendant

27   
 Peggy A. Leen  
 28 United States Magistrate Judge

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of XAVIER GONZALES, ESQ., and that I served the foregoing **MOTION FOR ENLARGMENT OF TIME** by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order, this 13<sup>th</sup> of August to the following party:

DANIEL G. BOGDEN  
United States Attorney District of Nevada  
KATHRYN C. NEWMAN  
Assistant United States Attorney  
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*Counsel for Plaintiff United States*

By: /s/ Liliana Mier  
An Employee of XAVIER GONZALES, ESQ.

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